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Of Attorneys for Defendant Ed Needles

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

<b>UNITED STATES OF AMERICA,</b>	)
	) <b>NO. CR 09-476-1-MO</b>
Plaintiff,	)
	) <b>DEFENDANT NEEDLES'</b>
v.	) <b>MOTION TO CONTINUE</b>
	) <b>TRIAL DATE</b>
<b>ED NEEDLES,</b>	)
	)
Defendant.	)

Defendant Ed Needles, by and through his attorneys, Ransom Blackman LLP and Kendra M. Matthews, moves this Court for an Order continuing the trial date from the current trial date of February 23, 2010, for a period of approximately 60 days.

No prior continuance of the trial date has been sought.

Because this motion is necessary for defense preparation, Mr. Needles asks that the Court grant this motion and acknowledges that this motion will result in a finding of

excludable delay under the Speedy Trial Act through April 27, 2010.

18 U.S.C. § 3161(h)(8)(A). The ends of justice served by granting this motion outweigh the best interests of the public and Mr. Needles in a speedy trial.

On January 19, 2010, counsel for defendant met with co-defendant Joe McBroom's counsel, Francesca Freccero, and counsel for the government, Assistant United States Attorneys Dwight C. Holton and Neil J. Evans, regarding this request. Ms. Freccero indicated that Mr. McBroom would be filing a similar motion. Mr. Holton and Mr. Evans authorized counsel to advise the Court that the government has no objection to the defendants' motions to continue.

This motion is supported by the affidavit of counsel submitted herewith.

WHEREFORE it is respectfully requested that the instant motion be granted.

DATED this 22nd day of January, 2010.

Respectfully submitted,

RANSOM BLACKMAN LLP

/s/ KENDRA M. MATTHEWS

KENDRA M. MATTHEWS

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Of Attorneys for Defendant Ed Needles

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DEFENDANT NEEDLES' MOTION TO CONTINUE TRIAL DATE on the following attorneys by causing it to be electronically filed on January 22, 2010. According to prior case notices, each are enrolled in the Court's electronic notice system.

Dwight C. Holton  
Neil J. Evans  
Assistant United States Attorney  
United States Attorney's Office  
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Portland, OR 97204  
Of Attorneys for the Government

Francesca Freccero  
Federal Public Defender's Office  
101 S.W. Main St., Suite 1700  
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Of Attorneys for Defendant Joe McBroom

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